

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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**Investigation by the Department of Telecommunications  
and Energy on its own Motion into the Appropriate Pricing,  
based upon Total Element Long-Run Incremental Costs,  
for Unbundled Network Elements and Combinations of  
Unbundled Network Elements, and the Appropriate Avoided  
Cost Discount for Verizon New England, Inc.  
d/b/a Verizon Massachusetts' Resale Services in the  
Commonwealth of Massachusetts**

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**D.T.E. 01-20**

**MOTION OF VERIZON MASSACHUSETTS TO MODIFY THE PROCEDURAL  
SCHEDULE FOR SUBMITTING REVISED COMPLIANCE FILING**

Verizon Massachusetts ("Verizon MA") respectfully requests that the Department modify the Hearing Officer's procedural schedule for the filing of the revised compliance filing in the above-referenced matter. The modification would permit a brief extension for the submission of the electronic form of the filing and corresponding changes for the comment period.

On May 29, 2003, the Department of Telecommunications and Energy (the "Department") issued its Order on Verizon MA's compliance filing and required that Verizon MA submit a revised compliance filing within seven days. Order on Verizon MA Compliance Filing, D.T.E. 01-20-Part-A-B, at 63 (2003) ("Compliance Order"). Consistent with the Compliance Order, the Hearing Officer established a schedule for the filing of an electronic version of the revised compliance filing on June 5, 2003, with a paper version on June 12, 2003. Comments and reply comments by the parties are due on June 12, 2003 and June 19, 2003.

In support of this motion, Verizon MA states that the additional time is necessary to allow its subject matter experts to complete and review each of the cost study adjustments required by the Compliance Order. This work must be completed before all associated rate changes can be reflected in new tariff pages and a revised Compliance Tracking Matrix, which must then be converted to CD format for filing with the Department. These tasks cannot be completed for filing on the schedule established by the Department. It will take until June 9, 2003, for Verizon MA to complete and review the changes to the cost studies and the Compliance Tracking Matrix. These can be filed electronically on that date. The completion of the revised tariffs will follow and will be complete for filing on June 12, 2003. On that date, the electronic copy of the revised compliance tariffs can be filed as well as the paper copies of the studies, the Compliance Tracking Matrix and the revised compliance tariff.

Accordingly, Verizon MA requests that the Department adjust the procedural schedule to extend the date for the electronic filing of the cost studies and the Compliance Tracking Matrix until June 9, 2003, with the remainder of the filing due on

June 12, 2003. To permit a one-week time period for the filing of comments on the revised compliance filing, Verizon MA would propose that initial comments be due on June 19, 2003 and reply comments on June 26, 2003.

Respectfully submitted,

VERIZON MASSACHUSETTS

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